

Ex. 5 Deliberative Process (DP)

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Dust Products

Pyrethrins, phenothrin and permethrin are the only active ingredient alternatives to tetrachlorvinphos (TCVP) available for control of arthropod pests of pets in dust formulations

TCVP dust products provide control of fleas, ticks, sarcoptic mange mites and lice on pets and pet bedding

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The labels also recommend repeating the application weekly and at a minimum of 3 treatments for control of fleas, ticks, and lice. Label recommendations for sarcoptic mange mites differ slightly in that application may be applied more frequently. Veterinary consultation is always recommended when dealing with mange mites and resulting infections

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Numerous other insecticide formulations (i.e. EPA registered insecticide-impregnated pet collars, pesticidal shampoos, sprays, dips, spot-ons, and Food and Drug Administration (FDA) regulated treatments) are available for control of pests on pets. Among pet products, TCVP dusts would likely be considered a product for curative use that offers some limited residual benefit (labelled for 1-week control or less). Products providing similar immediate control of current infestation of these pests would be sprays, shampoos and veterinarian prescribed medications which may include shampoos or various other topical and feed-through treatments. However, other products such as impregnated collars and spot-on treatments offer control and prevention of these same pests for a much greater duration (1-7 months control) and thus would be the superior choice for long term prevention

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Ex. 5 Deliberative Process (DP) products containing other active ingredients (fipronil, imidacloprid, malathion, etc.) not in dust formulations are available to control these pests. Consumers utilizing TCVP dusts for typical pests such as fleas and ticks can choose the alternate TCVP spray formulations or a dust formulation of phenothrin, permethrin or pyrethrin as previously mentioned. Both dust and spray formulations can be used interchangeably and control the same key pests (fleas and ticks) as TCVP-based dust products. For mange mite and lice treatment consumers utilizing TCVP dusts would likely turn to other active ingredients in various formulation types. Several topical and impregnated collar products are registered for control and prevention of lice and the prevention of mange mites for pets, treatment of sarcoptic mange mites may predominantly come from veterinary prescribed medications which are associated with much greater costs (vet visit, prescription fee, and product cost).

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Collars

TCVP pet collars are a relatively low cost means of controlling fleas and ticks on companion animals. Alternative control mechanisms include collars formulated with other insecticides; liquid insecticides such as shampoos, sprays, and topical spot-ons; dusts or powders; and veterinary medicines. Most of these products can provide similar levels of control of both fleas and ticks as TCVP collars. Alternative pet collars include contain a combination of flumethrin and imidacloprid. Deltamethrin collars are also available for dogs. There are also several liquid products that would provide similar efficacy although retreatment is necessary to achieve the duration of control provided by a collar. These products often combine a pyrethroid, or similar chemical, with imidacloprid, indoxacarb, or pyriproxyfen.

Collars tend to provide six to seven months of control. Treatment with liquid products or veterinary medicines may need to be done monthly. A check of prices at several major pest supply stores in 2017 suggests that, converted to monthly costs, TCVP products tend to be lower cost relative to other products. However, several topical spot-on products based on etofenprox are available that may be within two or three dollars of TCVP collars and would probably be the most likely alternatives. Because they must be reapplied about every month, spot-on products are less convenient, however.

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Question for OGC:

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